

### **REMARKS**

Claims 21-25 and 34-35 were examined in the Final Office Action mailed on 22-Aug-2007 (hereafter "Second Final Office Action"). Claims 26-32 were in withdrawn status. Claims 21-25, 34 and 35 were rejected.

By virtue of this paper, claim 21 is sought to be amended, and new claims 36-39 are sought to be added. The amendments and additions are believed not to introduce new matter and their entry is respectfully requested. The amendments and additions are made without prejudice or disclaimer. Claims 26-32 remain withdrawn. Claims 21-25 and 34-39 are presented for reconsideration further in view of the below remarks.

### **Notice of Non-Compliant Amendment**

In the Notice of Non-compliant Amendment dated 11/02/2007, it was noted that the status of claim 28 should be 'WITHDRAWN-Currently Amended'. It is respectfully noted that the status is correct, but the amendments were performed in the previous response dated August 9 2007. The text of the claim is corrected to remove the text with strikethrough and the underlining of the text previously added. Withdrawal of the objection and continuation of examination is respectfully requested.

### **Related Applications**

It is first noted that the subject application is a parent of US (divisional) Application Number 11/307,499 (now US Patent Number: 7,146,238). The Examiner is respectfully requested to thoroughly examine the file wrapper, along with the art of record in that related application.

### **Overview of the Amendments/Additions**

It is respectfully noted that the new claim 36 is a generic claim that is supported by the Figures 2, 3, 3A and 3B and related description of the subject patent application. Claims 37, 38 and 39 are respectively supported by the alternative embodiments of Figures 3, 3A and 3B (and the corresponding description) respectively.

***Rejections under 35 U.S.C. §§ 102/103***

Claims 21-25 and 34-35 were rejected under 35 U.S.C. 102(b) (or alternatively under 35 U.S.C. § 103) as being anticipated by Patent Number WO 02/42555A1 naming as inventors Lipponen *et al* (hereafter Lipponen), and also by US Patent Number 4,152,202 issued to DeLigt (hereafter DeLigt).

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Without acquiescing with any of the contentions in the office actions, it is submitted that the presented claims are allowable over the art of record, at least for reasons noted below.

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In particular, currently amended claim 21 is allowable over DeLigt in reciting that the claim there is directed to controlling properties of a sheet of material after completing forming the sheet using the material. This feature is supported at least by the embodiments of at least Figures 2 through 8 which process the sheet after being formed from the material as described with respect to Figures 1, 1A and 1B of the subject patent application.

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In sharp contrast, Figures 2 and 3 of DeLigt, relied upon by the Examiner, is related to formation of the sheet using the material. The formation of the sheet is shown in DeLigt to be in Section A (web formation) in Figure 1, while the claimed subject matter of claim 21 is performed after section A of DeLigt. For example, the dependent claims 22-25 may relate to Section D of DeLigt (Calender Section).

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Furthermore, DeLigt does not disclose or reasonably suggest the claimed feature of "... a second control action to manipulate a cross-directional shape within said slice, ... a controller ... for calculating ..., and implementing ... said second control action at each of said plurality of actuators...".

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In other words, the claimed controller calculates the desired cross directional shape and implements the computed shape at each of the actuators.

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DeLigt does not teach (or enable) such a feature as evidenced, for example, by the absence of any corresponding control to the nozzles 35-37 from the command station 41 of Figure 3, even assuming arguendo that the nozzles can cause the cross-directional shape to be modified as asserted by the Examiner in the Second Final Office Action.

Accordingly, DeLight does not teach or reasonably suggest several features of currently amended claim 21.

Similarly, Lipponen also does not teach or reasonably suggest several features of amended claim 21. For example, amended claim 21 recites that the actuators are distributed in the cross-machine direction at respective fixed positions over the sheet of material.

In sharp contrast, Lipponen relies on movement of profiling nozzles on a guide (See Figure 1 of Lipponen) to control moisture profile of a paper web.

It is further respectfully pointed out that the solutions taught in Lipponen and DeLight are directed to different sections of manufacturing of sheets. As pointed above, the solutions of DeLight are directed towards web formation, while the solutions of Lipponen are directed to sections thereafter.

Accordingly, it is asserted that amended claim 21 is allowable over the art of record.

Claims 22-25 and 34-35 depend from claim 21 and are thus allowable at least for the reasons noted above with respect to claim 21.

New independent claim 36 is allowable over the art of record at least in reciting, "... said outlet chamber being formed by a space between a first plate, a second plate and an outer wall, wherein said first plate is designed to contain a nozzle through which steam is received, and said second plate contains a plurality of openings to allow passage of steam received from said nozzle onto said sheet of material, said outlet chamber being operable to release steam of a magnitude and also to manipulate a cross-directional shape within said slice, each outlet chamber being controllable to release steam to vary both said magnitude and said cross-directional shape within said slice..."

The art of record clearly does not disclose or reasonably suggest such an outlet chamber for controlling both the claimed magnitude and cross-directional shape.

Accordingly, new claim 36 is allowable over the art of record.

New claims 37-39 depend from claim 36 and are allowable at least for the reasons noted above with respect to claim 36.

***Conclusion***

5 All the rejections are thus believed to have been overcome. Withdrawal of the outstanding rejections, and continuation of examination is respectfully requested. The Examiner is invited to telephone Mr. Anthony Miologos at 602-313-5683 if it is believed that an interview might be useful for any reason.

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Respectfully submitted,

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